

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

CHARLESTON DIVISION

2:15-cr-472-RMG

United States of America,

vs.

Dylann Storm Roof

**EX PARTE MOTION FOR A SUBPOENA *DUCES TECUM* AND FOR THE PRE-TRIAL
PRODUCTION OF DOCUMENTS PURSUANT TO FEDERAL RULES OF CRIMINAL
PROCEDURE RULE 17(b) & 17(c)**

Comes now the Defendant through his undersigned attorneys who asks this Court to issue a subpoena *duces tecum* to LT Fletcher King of the Criminal Intelligence Unit for the Charleston County Sheriff's Department, (hereafter Intelligence Unit), to appear in the United States District Court for the District of South Carolina, Charleston Division at a time to be determined and to bring with him the following documents:

1. Any and all documents which include the Intelligence Unit's mission;
2. Any and all documents which include all procedures and guidelines for the Intelligence Unit;
3. Any and all documents which include all of the Intelligence Unit's training materials;
4. Any and all documents which include the names, rank and position of personnel in the Intelligence Unit;
5. Insofar as they concern the seizure of any and all documents from the Defendant's person, cell, or box, any and all documents of any kind whatsoever including but not limited to notes, letters and memoranda, which refer in any way to written or oral communications between any employees of

the Sheriff's Office, whether law enforcement officers or civilian employees, and representatives of the FBI, the US Attorney's Office, the Ninth Circuit Solicitor's Office, the Charleston City Police and the State Law Enforcement Division.

The Defendant also asks this Court to issue an Order which requires LT Fletcher King, to make copies of the above documents and provide them to his attorney or his attorney's representative within ten (10) days of service of the subpoena *duces tecum*.

The Defendant is indigent and he asks this Court to exempt him from paying travel expenses and the witness fee to Lauren Mosher.

Respectfully Submitted,

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